

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATIONS OF MEWBOURNE OIL COMPANY
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

Case Nos. 16494 and 16495

AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Mewbourne Oil Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Mewbourne Oil Company
Suite 1020
500 West Texas
Midland, Texas 79701

Attention: Tyler Jolly
(432) 682-3715

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT

EOG Resources, Inc.
XTO Energy Inc.

Marathon Oil Permian LLC

OPPONENT'S ATTORNEY

Holland & Hart LLP

Jennifer Bradfute

STATEMENT OF THE CASE

APPLICANT

Case No. 16494: Applicant seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the N/2 of Section 20 and the N/2 of Section 19, Township 22 South, Range 28 East, NMPM. The unit will be dedicated to: (a) The Little Giants 20/19 W0AD Fed. Com. Well No. 1H, to be drilled to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the NE/4NE/4 of 20 and a final take point in the NW/4NW/4 of Section 19; (b) The Little Giants 20/19 W0HE Fed. Com. Well No. 2H to be drilled to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4NE/4 of 20 and a final take point in the

SW/4NW/4 of Section 19; and (c) The Little Giants 20/19 W0HE Fed. Com. Well No. 3H to be drilled a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4NE/4 of 20 and a final take point in the SW/4NW/4 of Section 19.

Case No. 16495: Applicant seeks an order pooling all mineral interests in the Wolfcamp formation in a horizontal spacing unit comprised of the S/2 of Section 20 and the S/2 of Section 19, Township 22 South, Range 28 East, NMPM. The unit will be dedicated to: (a) The Little Giants 20/19 W0PM Fed. Com. Well No. 1H, to be drilled to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4SE/4 of 20 and a final take point in the SW/4SW/4 of Section 19; (b) The Little Giants 20/19 W0PM Fed. Com. Well No. 2H to be drilled to a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the SE/4SE/4 of 20 and a final take point in the SW/4SW/4 of Section 19; and (c) The Little Giants 20/19 W0IL Fed. Com. Well No. 3H to be drilled a depth sufficient to test the Wolfcamp formation. The well is a horizontal well with a first take point in the NE/4SE/4 of 20 and a final take point in the NW/4SW/4 of Section 19.

Also to be considered will be the cost of drilling, completing, and equipping the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Tyler Jolly
(landman)

EST. TIME

15 min.

EXHIBIT

Approx. 10

Charles Crosby
(geologist)

15 min.

Approx. 8

OPPONENTS

WITNESSES

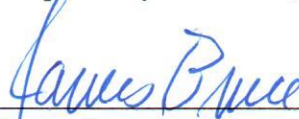
EST. TIME

EXHIBIT

PROCEDURAL MATTERS

If the cases are unopposed they will be presented by affidavit.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

Attorney for Mewbourne Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 14th day of July, 2020 by e-mail:

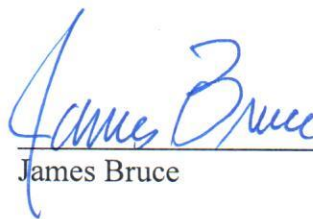
Michael Feldewert
mfeldewert@hollandhart.com

Adam Rankin
agrarkin@hollandhart.com

Julia Broggi
jbroggi@hollandhart.com

Kaitlyn Luck
kaluck@hollandhart.com

Jennifer Bradfute
jbradfute@marathonoil.com


James Bruce